

EXHIBIT A

1 UNITED STATES DISTRICT COURT DISTRICT OF MASS.
2 MDL Docket No. 1629 Master File No. 04-10
3 In re: NEURONTIN MARKETING,
4 SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION
5 _____ x THIS DOCUMENT RELATES TO:
6 Bulger v. Pfizer, et al.
7 07-CV-11426-PBS _____ x
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9
10 VIDEO DEPOSITION OF JANET ARROWSMITH-LOWE, M.D. Jar
11 9:18 a.m. Homewood Suites by Hilton
12 7101 Arvada Avenue, N.E. Albuquerque, New Mexico
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14
15 PURSUANT TO THE FEDERAL RULES OF CIVIL PROCEDURE, this deposition
16 TAKEN BY: MR. KEITH L. ALTMAN
17 Attorney for the Products Liability Plaintiffs
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22 REPORTED BY: Jan A. Williams, RPR, CCR 14 Bean & Associates
23 Professional Court Reporting Service 201 Third
24 Albuquerque, New Mexico 87102
25 (1945D) JAW

1 A. I know about the practices of FDA and what
2 data are available to FDA. And based on that I can
3 estimate that probably they did know about Neurontin's
4 off-label use.

5 MR. BARNES: Is this a good time to break for
6 lunch?

7 MR. ALTMAN: Yeah, if you want to. Why don't
8 we go off the record.

9 THE VIDEOGRAPHER: We are off the record.
10 The time now is 12:21 p.m.

11 (Recess.)

12 THE VIDEOGRAPHER: We are on the record. The
13 time now is 1:15 p.m.

14 BY MR. ALTMAN:

15 Q. Dr. Arrowsmith-Lowe, we're going to move off
16 of your addendum to your supplemental report and onto
17 some other things.

18 A. Okay.

19 Q. Are you aware that in the end of January of
20 2008, the FDA came out with an alert associated with
21 anticonvulsant drugs and suicidality?

22 A. Yes, I'm aware of that.

23 Q. Have you read that alert?

24 A. Yes.

25 Q. Okay. Are you aware that in May of 2008, the

1 FDA published a statistical review associated with
2 that alert?

3 A. I'm aware of that, yes, of that statistical
4 review, yes.

5 Q. Did you review that statistical review?

6 A. Yes, I've read it.

7 Q. Okay. Are you aware that in July of 2008,
8 the FDA convened an advisory committee to discuss what
9 proposed label changes associated with the
10 anticonvulsants and suicidality?

11 MR. BARNES: Objection, incomplete question
12 regarding what the advisory committee did. But go
13 ahead and answer.

14 THE WITNESS: I'm aware that FDA convened a
15 joint advisory committee, yes, to discuss AEDs and
16 suicide.

17 BY MR. ALTMAN:

18 Q. Okay. Did you review that transcript?

19 A. Yes.

20 Q. At the time the FDA alert came out, were you
21 qualified to render opinions based upon the FDA alert?

22 A. I don't understand what you're asking me.

23 Q. Were you qualifying to render opinions
24 concerning the FDA alert and what it means and what it
25 meant for Neurontin?

1 A. I believe so, yes.

2 Q. When the statistical analysis came out in May
3 of 2008, were you qualified to render opinions based
4 upon the FDA's statistical review and its adequacy and
5 completeness and appropriateness?

6 A. Yes.

7 Q. When the -- when you read the advisory
8 committee transcript in July -- from July of 2008,
9 were you qualified to render opinions based upon what
10 was discussed at the advisory committee?

11 A. In my opinion, yes.

12 Q. Okay. Thank you. Dr. Arrowsmith-Lowe, are
13 you familiar with the term a Daubert hearing?

14 A. I generally know what it means, yeah.

15 Q. And I think you've been subject to Daubert
16 hearings in the past, correct?

17 A. I don't know.

18 Q. Do you know if a court has ever reviewed your
19 expert reports and depositions to decide whether you
20 were -- would be allowed to testify in court?

21 A. I don't know.

22 Q. What's your understanding of what a Daubert
23 hearing is?

24 A. Well, I thought it had to do with the quality
25 or the appropriateness of the data on which a claim is